

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY  
SERVICES BUSINESSES (TAMSB);  
HIGH VALUE, INC.; REYNOSA CASA  
DE CAMBIO, INC.; NYDIA  
REGALADO d/b/a BEST RATE  
EXCHANGE; MARIO REGALADO d/b/a  
BORDER INTERNATIONAL  
SERVICES; LAREDO INSURANCE  
SERVICES, LLC; E.MEX. FINANCIAL  
SERVICES, INC.; R & C, INC. d/b/a  
TEMEX MONEY EXCHANGE; SAN  
ISIDRO MULTI SERVICES, INC.; CRIS  
WIN INC. d/b/a BROWNSVILLE CASA  
DE CAMBIO; ESPRO INVESTMENT  
LLC d/b/a LONESTAR MONEY  
EXCHANGE; and ARNOLDO  
GONZALEZ, Jr.,

*Plaintiffs,*

v.

PAM BONDI, Attorney General of the  
United States; SCOTT BESENT,  
~~Secretary of the Treasury~~; UNITED  
STATES DEPARTMENT OF THE  
TREASURY; ANDREA GACKI, Director  
of the Financial Crimes Enforcement  
Network; and FINANCIAL CRIMES  
ENFORCEMENT NETWORK,

*Defendants.*

Civil Case No. 5:25-cv-00344-FB

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DECLARATION OF EDELMIRO J. MARTINEZ  
OF E.MEX FINANCIAL SERVICES, INC.

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I, Edelmiro J. Martinez, being of competent mind, declare as follows:

1. I am a United States citizen and a resident of Laredo, Texas. I am 64 years old.
2. I am the owner and principal shareholder of E.Mex Financial Services, Inc, a Texas

corporation, which is a plaintiff in the above-captioned civil action.

3. I have run E.Mex in different capacities for the last 20 years, I am still actively involved on a day-to-day basis. I have the authority to speak for E.Mex Financial Services, Inc.

4. E.Mex Financial Services, Inc., is registered with the federal Financial Crimes Enforcement Network (“FinCEN”) as a Money Services Business (“MSB”) because it offers currency exchange services.

5. Because it offers those services in GTO-affected zip codes, E.Mex Financial Services, Inc. is subject to FinCEN’s March 14, 2025, geographic targeting order (the “Border GTO”) requiring MSBs to file Currency Transaction Reports (“CTRs”) for cash transactions over \$200.

6. I estimate that at least 600 of the transactions that we process daily are for more than \$200 and would require a CTR under the Border GTO.

7. I know that a CTR is currently required for cash transactions of \$10,000 or more. Before the Border GTO came into effect, E.Mex Financial Services, Inc., filed between 3-8 CTR(s) per week.

8. The Border GTO is going to radically increase the number of CTRs that we have to file. In a typical month, we do between 18,000-20,000 cash transactions over \$200 within the covered zip codes.

9. If transaction volume remains the same under the Border GTO, filing all of those additional CTRs would take at least 3-5 new full-time employees and would require a substantial amount of additional time, of at least 160 additional hours per week.

10. Under our current procedures, we collect some customer information for some kinds of transactions. However, for transactions under \$10,000 we do not provide that information

to the federal government.

11. We value our customers' privacy, and when we collect information from our customers we comply with all applicable privacy laws.

12. We also value the privacy of our business records, and we treat information about transactions at our business as proprietary business information.

13. We currently conduct some transactions over \$200 but below \$1,000 without collecting any information from our customers.


14. The Border GTO forces us to collect information on our customers that we would not otherwise collect and to report information to the federal government that we would not otherwise report.

15. Many customers will not want to provide their sensitive personal information every time they do legal, low-dollar, everyday transactions. And, since the Border GTO does not apply to every zip code, they can take their business to other businesses that are not affected.

16. The Border GTO will either drive away our customers or, if it does not, will impose massive and unsupportable compliance costs. Either way, the impact on our business will be catastrophic.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 6th day of May, 2025.

  
Edelmiro J. Martinez